

FEB 10 1989

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Ms. Karen S. Shearer
Associate Registration Manager, Herbicides
Rhone Poulenc AG Company
P.O. Box 12014 2 T.W. Alexander Drive
Research Triangle Park, NC. 27709

Dear Ms. Shearer:

We have received your January 9, 1989 letter regarding the acifluorfen meeting held at the Agency on December 21, 1988. In that letter you requested written confirmation of certain issues discussed at that meeting.

The Agency will grant an extension of time for the next progress report until after the results of the Spring sampling are available. The next progress report will be due June 30, 1989. Further progress reports will be due every six months after that date.

Since all samples analyzed to date for the prospective and retrospective studies showed no presence of metabolites, EPA approves your analyzing only for the acifluorfen acid and/or salt.

If you have any questions regarding this letter, please call Betty Crompton (703) 557-2558 or Geraldine Werdig (703) 557-7436.

Sincerely yours,

Edwin F. Tinsworth, Director
Special Review and
Reregistration Division

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CONCURRENCES							
SYMBOL	TS-767	G.C.S.B.					
SURNAME	Crompton	Werdig					
DATE	1/17/89	2/3/89					

EPA Form 1320-1 (12-70)

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RHÔNE-POULENC AG COMPANY

EPA Correspondence No. 89-12

January 9, 1989

Ms. Geraldine W. Werdig
U.S. Environmental Protection Agency
Office of Pesticide Programs
Special Review and Reregistration Division
Generic Chemical Support Branch
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Dear Ms. Werdig:

Re: Acifluorfen Ground Water Data Call-in
Prospective and Retrospective Leaching Studies

On December 21, 1988, a meeting was held at the Environmental Protection Agency (EPA) headquarters to discuss recent results found in the small scale prospective and small scale retrospective soil dissipation studies. The persons attending the meeting were Russell Jones, Frank Norris, Peg Cherny and myself representing Rhône-Poulenc Ag Company (RPAC); Jack Graham and Karen Blundell representing BASF Corporation; Catherine Eiden, W. Martin Williams, and Betty Crompton representing EPA. The following following points were discussed in detail:

Small Scale Prospective Soil Dissipation Study

1. Results from sampling taken five months after application were discussed. The data showed that the ground water residues found beneath the field were sporadic and suggested preferential flow through channels (macropores) in the soil. EPA stated that our conclusion appeared consistent with the data.
2. EPA agreed that additional ground water sampling in January through March 1989 was not necessary due to weather conditions and belief that there would be no degradation of residues once in groundwater. Samples will be taken in April, 1989. After the April results are evaluated, it will be decided whether or not the study may be terminated.
3. EPA questioned acifluorfen useage in geographic areas that may have similar soil characteristics as the Wisconsin test site. Both RPAC and BASF agreed to prohibit acifluorfen useage in eight counties of the central sand region of Wisconsin and Long Island, New York. EPA expressed concern about use in Florida. However, we stated that use in Florida was in the northern or southern areas and not in central sand ridge of Florida, since no soybeans or peanuts are grown in that region. The mechanism for regulatory actions will be discussed by both RPAC and BASF with EPA at a later date.

4. Progress report which is due March 1989 may be postponed until after the results of the Spring sampling are available. Written EPA confirmation regarding the extension will be forthcoming. ✓ yes

Small Scale Retrospective Soil Dissipation Study

1. Data from the small scale retrospective studies in North Carolina and Virginia were presented. The results showed that no residues were detected in ground water at either test site and very low residues were found in the upper soil layers in Virginia. EPA felt that these results were helpful but still questioned application of other acifluorfen use areas.
2. A proposed revised retrospective protocol was presented. The protocol was expanded to include a limited prospective study in which herbicide will be applied under typical use rate and conditions. Lysimeters will not be used in these evaluations. A copy of the revised retrospective/limited prospective protocol was provided to EPA for their initial review. A finalized (signed) protocol will be submitted in early 1989.
3. Three additional sites will be selected for the revised retrospective/prospective studies. These sites will be in the North Central region (Minnesota), the Midwest (Illinois) and South (outside the Delta, possibly Arkansas or Texas). Selection of the additional sites will be initiated as soon as possible with sampling to begin in Spring 1989. The site selection criteria will be the same as used in selecting the North Carolina and Virginia locations. Details regarding the soil characteristics will be provided to EPA on an informal basis before the selection of test locations is finalized.

General

1. A request was made for EPA approval to analyze only for the acifluorfen acid and/or salt. All samples analyzed to date for the prospective or retrospective studies showed no presence of metabolites. EPA gave verbal approval that we may analyze for parent compound only. We would appreciate written confirmation that this change in the analytical method procedure is acceptable. ✓ I think that's correct CFS
yes C.F.

If you have any questions concerning this accounting, please contact us.

Sincerely,

Karen S. Shearer

Karen S. Shearer
Associate Registration Manager, Herbicides

cc: J. Graham - BASF Corp.

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